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VIA ELECTRONIC MAIL

August 21, 2020

Our File No. 474-02

Hon. Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**RE: *Jessica Denson v. Donald J. Trump for President, Inc.*, No. 1:20-cv-04737-PGG
(S.D.N.Y.)**

Dear Judge Gardephe:

My law firm represents Alva Johnson, a former employee of Donald J. Trump for President, Inc. (“the Trump Campaign”). I have been following Ms. Denson’s lawsuit and felt it necessary to correct a factual misstatement in the Trump Campaign’s Opposition to Plaintiff’s Motion for Summary Judgment, Dkt. 34.

The Trump Campaign states in its brief that “Ms. Johnson ha[s] no pending disputes with the Campaign.” *See* Dkt. 34 at 4 fn.2. This statement is untrue. In fact, the Campaign sued Ms. Johnson in the American Arbitration Association (“AAA”) on September 23, 2019 for allegedly violating the Campaign’s form non-disclosure agreement (“form NDA”). The Trump Campaign alleges that Ms. Johnson violated the form NDA—which is identical to the NDA that is at issue in the case before you—when she and her attorneys made statements about her lawsuit, *Alva Johnson v. Donald J. Trump et al.*, No. 8:19-cv-00475 (M.D. Fla.). A copy of the Amended Statement of Claim and an Exhibit filed with the Arbitrator identifying the alleged violations are enclosed. *See* Exs. 1-2.

Contrary to the Campaign’s representation to the Court, the arbitration proceeding remains pending with a hearing scheduled for May 2021.

Regards,

A handwritten signature in blue ink, appearing to read "H.A. Zavareei", with a stylized flourish at the end.

Hassan A. Zavareei

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2020 I caused the foregoing document and exhibits thereto to be served upon the interested parties as follows via first-class mail:

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